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January 9, 1995

Via Courier

Mr. William Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20054

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

**Re: Comments Submitted in CC Docket No. 94-102; In the Matter of
Revision of Commission's Rules to Ensure Compatibility With 911
Emergency Calling Systems**

Dear Mr. Caton:

Transmitted herewith, on behalf of Geotek Communications, Inc., and its subsidiaries and affiliates, are Comments in the above-reference proceeding. If any questions should arise related to this pleading, please contact the undersigned counsel.

Sincerely,



Susan H.R. Jones

Enclosure

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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JAN 9 1995

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
)
Revision of the Commission's Rules)
to Ensure Compatibility With)
911 Emergency Calling Systems)

Docket No. 94-102

To: The Commission

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COMMENTS OF GEOTEK COMMUNICATIONS, INC.

The Geotek Communications, Inc., and its subsidiaries and affiliates ("Geotek"), by its attorneys, pursuant to Section 1.415 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 1.415, hereby submits its Comments in response to the Notice of Proposed Rule Making ("NPRM") adopted in the above referenced proceeding.¹ In this proposed rulemaking, the Federal Communications Commission ("FCC" or "Commission") considers whether to require compatibility of 911 emergency services with private branch exchange ("PBX") systems, and whether to ensure the availability of enhanced 911 services to mobile radio callers.

I. INTRODUCTION

Geotek intends to focus on commercial and business organizations providing internal network services to manage and control fleets of vehicles and personnel necessary to the operations of a mobile workforce. With a primarily two-way dispatch communications service, Geotek's

¹ Notice of Proposed Rule Making, CC Docket No. 94-102, FCC 94-237 (released October 19, 1994).

customers will select from a variety of wireless communications services provided over the 900 MHz spectrum band, including voice and data transmission, and/or interconnection to the public switched network.

In this Notice the Commission proposes to require that commercial mobile radio service (“CMRS”) providers ensure the same level of access to 911 emergency services as is available to the wireline customer. Such a proposal, if adopted, will impose significant burdens upon Geotek as a provider of dispatch wireless service. Because of this impact, Geotek welcomes this opportunity to participate in this proceeding.

II. COMMENTS

In the NPRM, the Commission seeks comment, as a threshold matter, upon how it should define the categories of mobile radio service that might be subject to compatibility requirements for enhanced 911 services. The Commission proposes in paragraph 38 of the NPRM that mobile radio service providers offering access to real-time voice services on the public switched network may be an appropriately defined category. Geotek supports the FCC’s proposed definition but urges the Commission to clarify it to specifically *exclude* specialized mobile radio (“SMR”) operators which offer as their primary service, two-way dispatch service, with optional access to the public switched network.

A. SMR Operators Should Not Be Required to Comply with 911 Compatibility.

In paragraph 38 of the NPRM, the Commission acknowledges that private mobile radio services, “which may not be available to the public or interconnected with the public switched network” are *not* included in its proposals to require 911 compatibility. Geotek supports the adoption of this proposal and urges the Commission to include in this excluded category, two-

way dispatch SMR operators which provide communications services primarily off the public switched network.

Geotek's primary market is commercial and business organizations which use Geotek's dispatch service as a low-cost internal communications system among fleets of a mobile workforce. Although interconnection to the public switched network is available as a service option, many of Geotek's customers operate within the dispatch-only capability of the system. In view of this, the customer's perceptions and expectations of capabilities for Geotek's system differs significantly from the expectations and perceptions of the customer of a typical broadband CMRS system. The broadband customer is likely to view the cellular telephone, or other forms of broadband wireless services, as a mobile alternative to the wireline telephone service. A Geotek customer will not have the same expectations. In view of this disparity between the services provided by dispatch SMR providers and by other mobile radio providers, and specifically the customer's perceptions regarding those services, the Commission's concern that "[w]ireless customers clearly expect access services, and may be unaware that their mobile radio services do not provide . . . [the same 911 services] as the wireline network." is not entirely relevant to *all* wireless customers.²

In the NPRM, the Commission noted that "wireless 911 services are inferior to the wireline 911 services that telephone users have come to expect."³ The Commission thus apparently seeks to require adequate 911 compatibility for wireless services which are used as parallel technology to traditional wireline telephones. SMR systems which provide *primarily* dispatch services to businesses and commercial customers, like Geotek, are not within this

² NPRM, paragraph 37.

³ Id., paragraph 10.

context. Simply, an employee of a trucking company does not expect the wireless transmitter, used for dispatch between a fleet of trucks and the base office, to provide similar access to emergency 911 services as a wireline telephone. Accordingly, the Commission should not impose on SMR providers, the 911 compatibility requirements it intends for telephone-like wireless providers. In the alternative, the Commission may require an SMR provider to disclaim to its customers that the SMR service and equipment does not provide access to enhanced 911 emergency services which are proposed in the NPRM. The FCC could impose similar labeling requirements as those proposed in paragraph 55 of the NPRM.

B. The FCC Should Not Require SMR Operators to Provide 911 Compatibility for Dispatch-Only Customers.

Even if the FCC requires SMR operators, as a class, to provide 911 compatibility, the Commission should clarify that 911 emergency service need not be provided to SMR customers who choose non-interconnect dispatch service. Without this clarification, wireless providers like Geotek would be subject to significant technical and operational difficulties.

As an illustration of these difficulties, a Geotek customer without interconnect capability may not have a key pad to dial 911, and may not have a ten digit telephone number. Without a keypad and telephone number, ensuring compatibility to 911 *enhanced* services (including location of caller, telephone number of caller, automatic call-back capability, or type of emergency service required) may be technically infeasible.

As for vehicle location, Geotek can provide directional information for its mobile customers with technological upgrades on the existing equipment. In fact, Geotek intends to offer vehicle location capability to its customers, as an option within a customized service

package. If, however, Geotek is required to provide such enhancements of its service to all of its customers, the cost-effective benefits to its service will be negated for those customers who currently do not elect the add-ons for extra cost. Indeed, Geotek's traditional SMR architecture with a single high-power transmitter does not lend itself to the triangulation methods of position location available to cellular-like architecture used by ESMR and cellular providers.


To ensure compatibility with all of the elements to 911 emergency services, Geotek would need to redesign and re-implement infrastructure to ensure that the handsets, base stations, and public switched networks were capable of transmitting, receiving, and translating the information necessary to complete an enhanced 911 emergency call. The cost of implementing such technical and operational modifications would, indeed, be passed on to the customer by necessity. Doing so would be to the detriment of the majority segment of Geotek's customer base: businesses who need primarily dispatch radio. Geotek asserts that this is contrary to the public interest and that the public interest is, in fact, best served by the Commission exempting SMR operators providing primarily dispatch service from emergency 911 service compatibility.

III. CONCLUSION

WHEREFORE, THE PREMISES CONSIDERED, Geotek Communications, Inc. respectfully submits foregoing Comments and urges the Commission to proceed in a manner consistent with the views expressed herein.

Respectfully submitted,

GEOTEK COMMUNICATIONS, INC.

By: 
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Dated: January 9th, 1995